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7 Attorney for Johnney A. Hedge

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JOHNNEY A. HEDGE,

15 Defendant.  
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Case No. 2:21-cr-00317-GMN-NJK-1

**STIPULATION TO CONTINUE  
SENTENCING**  
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.  
18 Frierson, United States Attorney, and Robert Knief, Assistant United States  
19 Attorney, counsel for the United States of America, and Rene L. Valladares,  
20 Federal Public Defender, and Navid Afshar, Assistant Federal Public Defender,  
21 counsel for Johnney A. Hedge, that the sentencing hearing currently scheduled for  
22 June 13, 2023, be vacated and set to a date and time convenient to this Court, but  
23 no sooner than forty-five (45) days.

24 The Stipulation is entered into for the following reasons:

25 1. Undersigned defense counsel is currently in trial and due to a  
26 separate scheduling conflict, needs additional time to research information to be

presented in the Pre-sentence Investigation Report, make any necessary objections, and prepare possible mitigation information, prior to proceeding with the sentencing hearing.

2. The defendant is incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

This is the first stipulation to continue filed herein.

DATED this 10th day of May, 2023.

RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

By /s/ Navid Afshar

By /s/ Robert Knief

NAVID AFSHAR  
Assistant Federal Public Defender

ROBERT KNIEF  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

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4 UNITED STATES OF AMERICA,

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7 JOHNNEY A. HEDGE,

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**ORDER**

10 The best interest of justice being served and all parties being in agreement:

11 IT IS THEREFORE ORDERED that the sentencing hearing currently  
12 scheduled for June 13, 2023, at 11:00 a.m., be vacated and continued to  
13 August 8, 2023 at the hour of 9:00 AM.

14 DATED this 10 day of May, 2023.

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17 UNITED STATES DISTRICT JUDGE  
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